

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

Case No. 24-cv-6563 (LJL)

**DECLARATION OF REGINA S. SCOTT
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGEMENT**

I, Regina S. Scott, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age and not a party to this action.
2. I was engaged by counsel for Plaintiffs Ruby Freeman and Wandrea' ArShaye Moss (collectively, "Plaintiffs"), to review statements made by Mr. Rudolph W. Giuliani (the "Defendant") about his location between June 17, 2024 and August 29, 2024, and to review video livestreams broadcast by the Defendant that indicate his location during that time period.
3. I have personally reviewed Mr. Giuliani's public broadcasts of his daily livestream programs, *The Rudy Giuliani Show* and *America's Mayor Live*. Where applicable, I have also reviewed other information relevant to Defendant's location derived from social media posts and press reports.
4. Mr. Giuliani simultaneously published each of his daily livestream programs on multiple platforms, including but not limited to YouTube, Twitter/X, Facebook, and Rumble. The livestreams remain publicly accessible on most if not all of those platforms. For each livestream program, however, I have provided a link to only one such platform where the program remains

publicly accessible, and an archival link using the perma.cc service. I have also maintained downloaded copies of each video livestream and provided them to Plaintiffs' counsel.

5. All quotations from the livestream programs transcribed below are true and correct transcriptions of statements that Mr. Giuliani made on the respective programs, at the time codes listed. Unless otherwise indicated, quotations from Mr. Giuliani's broadcasts are Mr. Giuliani's own words..

6. On May 26, 2024 at 10:00 a.m., Mr. Giuliani broadcast an episode of his show, *Uncovering the Truth*.¹ The background of the video matches publicly available photographs of Mr. Giuliani's Palm Beach Condo.² This episode is available at <https://www.youtube.com/watch?v=ubqPs2b3qrg>. true and correct copy of that video is submitted with this Declaration as Exhibit 1.

7. On Monday June 17, 2024, Mr. Giuliani broadcast an episode of *The Rudy Giuliani Show*.³ During the show, Mr. Giuliani stated "we are here in New York."⁴ The background behind Mr. Giuliani appears to be his New York Apartment.⁵ This episode is available at <https://www.youtube.com/watch?v=CfVtnvORzko>. A true and correct copy of that video is submitted with this Declaration is submitted with this Declaration as Exhibit 2.

¹ Rudy W. Giuliani, Uncovering the Truth, *Uncovering the Truth (E3): Sunday, May 26, 2024*, YouTube (May 26, 2024 10:00 AM EST) <https://www.youtube.com/watch?v=ubqPs2b3qrg>.

² Brian Bandell, *Rudy W. Giuliani, wife list Palm Beach condo for sale (Photos)*, The Business Journals (June 12, 2019 1:36 PM EDT), photo 4 of 15 (<https://www.bizjournals.com/southflorida/news/2019/06/12/rudy-giuliani-wife-list-palm-beach-condo-for-sale.html>).

³ Rudy W. Giuliani, The Rudy Giuliani Show, *The Rudy Giuliani Show (E26): Obama Helps Biden Off Stage*, YouTube, (June 17, 2024 3:00 PM EST) <https://www.youtube.com/watch?v=CfVtnvORzko> (archived at <https://perma.cc/DH3X-BFJX>).

⁴ *Id.* at 0:00–0:04.

⁵ 45 East 66th Street, 10W New York, New York, 10065 United States, Sotheby's International Realty <https://www.sothneysrealty.com/eng/sales/detail/180-l-1182-s4lfjd/45-east-66th-street-10w-lenox-hill-new-york-ny-10065>.

8. On Tuesday June 18, 2024 and Wednesday June 19, 2024, Mr. Giuliani broadcast episodes of *The Rudy Giuliani Show* and *America's Mayor Live* in of backgrounds that are either computer generated or do not suggest his location.⁶

9. The June 18, 2024 episode of *The Rudy Giuliani Show* is available at <https://www.youtube.com/watch?v=Lr9OJifA2co>. A true and correct copy of that video is submitted with this Declaration as Exhibit 3.

10. The June 18, 2024 episode of *America's Mayor Live* is available at <https://www.youtube.com/watch?v=DDLIOruIztA>. A true and correct copy of that video is submitted with this Declaration as Exhibit 4.

11. The June 19, 2024 episode of *The Rudy Giuliani Show* is available at <https://www.youtube.com/watch?v=c5ejjOe5RZY>. A true and correct copy of that video is submitted with this Declaration as Exhibit 5.

12. The June 19, 2024 episode of *America's Mayor Live* is available at <https://www.youtube.com/watch?v=x0lsF09tWVs>. A true and correct copy of that video is submitted with this Declaration as Exhibit 6.

⁶ Rudy W. Giuliani, The Rudy Giuliani Show, *The Rudy Giuliani Show (E27): Illegal Immigration is Destroying America*, YouTube, (June 18, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=Lr9OJifA2co> (archived at <https://perma.cc/85T9-QTFX>); Rudy W. Giuliani, America's Mayor Live, *America's Mayor Live (E432): Joe Biden is Getting Worse by the Hour*, YouTube, (June 18, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=DDLIOruIztA> (archived at <https://perma.cc/9CPT-R7VF>); Rudy W. Giuliani, The Rudy Giuliani Show, *The Rudy Giuliani Show (E28): Honoring Willie Mays—A Giant of New York*, YouTube, (June 19, 2024 3:00 PM EST) <https://www.youtube.com/watch?v=c5ejjOe5RZY> (archived at <https://perma.cc/ET74-LHX7>); Rudy W. Giuliani, America's Mayor Live, *America's Mayor Live (E432): Joe Biden is Getting Worse by the Hour*, YouTube, (June 19, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=x0lsF09tWVs> (archived at <https://perma.cc/7ULT-GE9R>).

13. On Thursday June 20, 2024, Mr. Giuliani broadcast an episode of *The Rudy Giuliani Show* and an episode of *America's Mayor Live*.⁷ Mr. Giuliani appears in front a wall mounted television, which displayed an American flag for segments of the broadcast.

14. The June 20, 2024 episode of *The Rudy Giuliani Show* is available at <https://www.youtube.com/watch?v=IqIEUJle2DI>. A true and correct copy of that video is submitted with this Declaration as Exhibit 7.

15. The June 20, 2024 episode of *America's Mayor Live* is available at <https://www.youtube.com/watch?v=7nkH9Sc7Yqw>. A true and correct copy of that video is submitted with this Declaration as Exhibit 8.

16. On Friday June 21, 2024, Mr. Giuliani broadcast *America's Mayor Live*.⁸ Mr. Giuliani began the broadcast by saying “Good evening, this is Rudy Giuliani with America’s Mayor Live and tonight, we’re coming to you from New Hampshire.”⁹ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1804303409044164798>. A true and correct copy of that video is submitted with this Declaration as Exhibit 9.

17. On Monday, June 24, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹⁰ Mr. Giuliani began the broadcast by saying “Good evening. This is Rudy Giuliani with America’s

⁷ Rudy W. Giuliani, The Rudy Giuliani Show, *The Rudy Giuliani Show* (E29): *Joe Biden's Con Job on the Border*, YouTube, (June 20, 2024 3:00 PM EST) <https://www.youtube.com/watch?v=IqIEUJle2DI> (archived at <https://perma.cc/KC5Y-6D7P>); Rudy W. Giuliani, America's Mayor Live, *America's Mayor Live* (E434): *ELECTION 2024—Previewing Next Week's Debate Between Trump & Biden*, YouTube, (June 20, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=7nkH9Sc7Yqw> (archived at <https://perma.cc/E74Z-KJ2B>).

⁸ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live* (E435): *ELECTION 2024—New Polling Reveals New Trends Among Voters*, X, (June 21, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1804303409044164798> (archived at <https://perma.cc/B7W4-CE7Y>).

⁹ *Id.* at 0:00–0:14.

¹⁰ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live* (E436): *ELECTION 2024—Previewing Thursday's Presidential Debate*, X, (June 24, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1805390500264132812> (archived at <https://perma.cc/56U5-Y8TV>).

Mayor Live and uh we're coming to you from New Hampshire.”¹¹ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1805390500264132812>. A true and correct copy of that video is submitted with this Declaration as Exhibit 10.

18. On Tuesday, June 25, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹² Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://www.youtube.com/watch?v=i9xM4fK5TWU>. A true and correct copy of that video is submitted with this Declaration as Exhibit 11.

19. On Wednesday, June 26, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹³ Mr. Giuliani began the broadcast by saying “Good evening, this is Rudy Giuliani with America's Mayor Live and uh, as you know I think, we're coming to you from New Hampshire.”¹⁴ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1806115297797284136>. A true and correct copy of that video is submitted with this Declaration as Exhibit 12.

20. On Thursday, June 27, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹⁵ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for

¹¹ *Id.* at 0:00–0:12.

¹² Rudy W. Giuliani, America's Mayor Live, *America's Mayor Live (E437): Previewing Thursday Night's Debate Between Trump & Biden*, YouTube, (June 25, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=i9xM4fK5TWU> (archived at <https://perma.cc/8TV5-8PVZ>).

¹³ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E438): Greatest Moments in U.S. Presidential Debate History*, X, (June 26, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1806115297797284136> (archived at <https://perma.cc/XH7L-MDXD>).

¹⁴ *Id.* at 0:00–0:10

¹⁵ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E439): DEBATE NIGHT IN AMERICA—Previewing The First 2024 Presidential Debate*, X, (June 27, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1806477759809810521> (archived at <https://perma.cc/EK5G-WMXZ>).

segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1806477759809810521>. A true and correct copy of that video is submitted with this Declaration as Exhibit 13.

21. On Friday, June 28, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹⁶ Mr. Giuliani started during the broadcast “We’re in New Hampshire, and the very interesting thing is, I think it may have been at Saint Anselm College, which is about four miles from here.”¹⁷ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://www.youtube.com/watch?v=wJJsC3SYCF4>. A true and correct copy of that video is submitted with this Declaration as Exhibit 14.

22. On Monday, July 1, 2024, Mr. Giuliani broadcast *America's Mayor Live*.¹⁸ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1807927225490235835>. A true and correct copy of that video is submitted with this Declaration as Exhibit 15.

23. On Tuesday, July 2, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.¹⁹ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

¹⁶ Rudy W. Giuliani, America's Mayor Live, *America's Mayor Live (E440): A Recap of Joe Biden's Terrible, Horrible, No Good, Very Bad Day*, YouTube, (June 28, 2024 8:00 PM EST) <https://www.youtube.com/watch?v=wJJsC3SYCF4> (archived at <https://perma.cc/E4MJ-ZLHE>).

¹⁷ *Id.* at 24:19–24:26.

¹⁸ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E441): Today's Supreme Court Ruling UPENDS The Left's Plan to Take Down Trump*, X, (July 1, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1807927225490235835> (archived at <https://perma.cc/253F-DAX8>).

¹⁹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show - Biden Campaign Facing Two Major Disasters as They Chart Path Forward - July 2024*, X, (July 2, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1808274482609770725> (archived at <https://perma.cc/ZW7F-KWA5>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E442): The Biden Campaign Digs in as*

24. The July 2, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1808274482609770725>. A true and correct copy of that video is submitted with this Declaration as Exhibit 16.

25. The July 2, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1808289624919625884>. A true and correct copy of that video is submitted with this Declaration as Exhibit 17.

26. On Wednesday, July 3, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²⁰ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

27. The July 3, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1808636994865840392>. A true and correct copy of that video is submitted with this Declaration as Exhibit 18.

28. The July 3, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1808652023916835235>. A true and correct copy of that video is submitted with this Declaration as Exhibit 19.

29. On Thursday, July 4, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²¹ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

²⁰ Democrat Party Falls into Full PANIC MODE, X, (July 2, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1808289624919625884> (archived at <https://perma.cc/E2LQ-E67R>).

²¹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Latest White House Leaks Indicate a Sinking Ship*, X, (July 3, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1808636994865840392> (archived at <https://perma.cc/P8XU-XNHM>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E443): Joe Biden Has No Path Forward if He's Lost the Establishment Media*, X, (July 3, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1808652023916835235> (archived at <https://perma.cc/2FCP-AFN8>).

²¹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Celebrating 248 Years of American Greatness*, X, (July 4, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1808999262723989905> (archived at <https://perma.cc/D8KL-JBBD>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live*

30. The July 4, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1808999262723989905>. A true and correct copy of that video is submitted with this Declaration as Exhibit 20.

31. The July 4, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1809014578166317289>. A true and correct copy of that video is submitted with this Declaration as Exhibit 21.

32. On Friday, July 5, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²² For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

33. The July 5, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1809361634135339216>. A true and correct copy of that video is submitted with this Declaration as Exhibit 22.

34. The July 5, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1809376842987762123>. A true and correct copy of that video is submitted with this Declaration as Exhibit 23.

35. On Monday, July 8, 2024, Mr. Giuliani broadcast *America's Mayor Live*.²³ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at

(E444): *Celebrating America's 248th Independence Day*, X, (July 4, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1809014578166317289> (archived at <https://perma.cc/72DH-PVWD>).

²² Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Joe Biden Doubles Down; Promises to Stay in Race*, X, (July 5, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1809361634135339216> (archived at <https://perma.cc/45LR-KA2H>); Rudy W. Giuliani, (@RudyGiuliani) *America's Mayor Live*, *America's Mayor Live (E444): Joe Biden Doubles Down Despite Growing Calls from Democrats to Bow Out*, X, (July 5, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1809376842987762123> (archived at <https://perma.cc/PN3H-UZFW>).

²³ Rudy W. Giuliani, (@RudyGiuliani) *America's Mayor Live*, *America's Mayor Live (E446): Growing Number of House Democrats Publicly Call on Biden to Drop Out*, X, (July 8, 2024 8:01 PM EST) <https://x.com/RudyGiuliani/status/1810464350546858080> (archived at <https://perma.cc/XS2J-SXGS>);

<https://x.com/RudyGiuliani/status/1810464350546858080>. A true and correct copy of that video is submitted with this Declaration as Exhibit 24.

36. On Tuesday, July 9, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²⁴ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

37. The July 9, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1810811212512526656>. A true and correct copy of that video is submitted with this Declaration as Exhibit 25.

38. The July 9, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1810826338305200397>. A true and correct copy of that video is submitted with this Declaration as Exhibit 26.

39. On Wednesday, July 10, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²⁵ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

40. The July 10, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1811173574960681258>. A true and correct copy of that video is submitted with this Declaration as Exhibit 27.

²⁴ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Joe Biden Blames the Media & Party "Elites" for Sabotaging Campaign*, X, (July 9, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1810811212512526656> (archived at <https://perma.cc/Z42L-7BFJ>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E447): BIDEN WATCH DAY 12—Seventh House Democrat Calls on Biden to Exit Race*, X, (July 9, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1810826338305200397> (archived at <https://perma.cc/R8HK-YAH5>).

²⁵ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *First Democrat Senator Calls on Joe Biden to Exit Race*, X, (July 10, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1811173574960681258> (archived at <https://perma.cc/56EC-4GJ8>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E448): BIDEN WATCH DAY 13—Nancy Pelosi is Preparing to Dump Joe Biden*, X, (July 10, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/181118878112025164> (archived at <https://perma.cc/SX5U-66CE>).

41. The July 10, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1811188781112025164>. A true and correct copy of that video is submitted with this Declaration as Exhibit 28.

42. On Thursday, July 11, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.²⁶ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

43. The July 11, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1811535971965657309> and <https://x.com/i/broadcasts/1BdxYEjgwwNxX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 29.

44. The July 11, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1811551104909644009> and <https://x.com/i/broadcasts/1YqxoveWYqZJv>. A true and correct copy of that video is submitted with this Declaration as Exhibit 30.

45. On Friday, July 12, 2024, Mr. Giuliani broadcast *America's Mayor Live*.²⁷ Mr. Giuliani began the broadcast by saying “Good evening, this is Rudy Giuliani and this is America’s Mayor Live, live from New Hampshire.”²⁸ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is

²⁶ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Dam Has Broken: Democrats Want Joe Biden OUT*, X, (July 11, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1811535971965657309> (post archived at <https://perma.cc/MS6L-J5DZ>), (video archived at <https://perma.cc/T8RS-LD7N>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E449): LIVE REACTION to Joe Biden's Disastrous NATO Press Conference*, X, (July 11, 2024 8:00 PM) <https://x.com/RudyGiuliani/status/1811551104909644009> (post archived at <https://perma.cc/WR4Y-4HSE>), (video archived at <https://perma.cc/BWB5-P8C4>).

²⁷ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E450): Team Biden Continues Cover-Up in Desperate Attempt to Save Campaign*, X, (July 12, 2024 8:00 PM) <https://x.com/RudyGiuliani/status/1811913557447147969> (post archived at <https://perma.cc/U96K-2ZZB>), (video archived at <https://perma.cc/PNB6-RL7C>).

²⁸ *Id.* at 0:00–0:09.

available at <https://x.com/RudyGiuliani/status/1811913557447147969> and <https://x.com/i/broadcasts/1DXGydmYrRyKM>. A true and correct copy of that video is submitted with this Declaration as Exhibit 31.

46. On Sunday, July 14, 2024, Mr. Giuliani was pictured attending a dinner in Milwaukee, Wisconsin.²⁹ This post is available at <https://x.com/TedCGoodman/status/1812690153355227380>. A true and correct copy of that post is attached as Exhibit 32.

47. On Monday, July 15, 2024, Mr. Giuliani broadcast The Rudy Giuliani Show.³⁰ Mr. Giuliani began the broadcast by saying “Good evening, this is Rudy Giuliani and we are beginning our coverage of the Republican National Convention.”³¹ The 2024 Republican National Convention took place in Milwaukee, Wisconsin. The lower third banner of the screen said “RUDY GIULIANI | AMERICA’S MAYOR LIVE FROM RNC 2024.” This episode is available at <https://x.com/RudyGiuliani/status/1812985445636317417> and <https://x.com/i/broadcasts/1PlJQbRwnnvxE>. A true and correct copy of that video is submitted with this Declaration as Exhibit 33.

48. On Tuesday, July 16, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.³² The lower third banner of the screen said “RUDY GIULIANI | AMERICA’S MAYOR LIVE FROM RNC 2024.” This episode is available at

²⁹ Ted Goodman (@TedCGoodman) X (July 14, 2024 11:26 PM EST) <https://x.com/TedCGoodman/status/1812690153355227380> (archived at <https://perma.cc/83YY-Z9E8>) (“We had a small dinner in Milwaukee to celebrate.”)

³⁰ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show Live from RNC*, X, (July 15, 2024 6:59 PM EST) <https://x.com/RudyGiuliani/status/1812985445636317417> (post archived at <https://perma.cc/4CH6-GJ5P>), (video archived at <https://perma.cc/J4PY-NEDH>).

³¹ *Id.* at 3:59–4:07.

³² Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show Live from RNC*, X, (July 16, 2024 7:09 PM) <https://x.com/RudyGiuliani/status/1813350146907996242> (post archived at <https://perma.cc/698Y-UW2B>), (video archived at <https://perma.cc/8HAJ-VY4L>).

<https://x.com/RudyGiuliani/status/1813350146907996242> and
<https://x.com/i/broadcasts/1nAKEpmolEXxL>. A true and correct copy of that video is submitted with this Declaration as Exhibit 34.

49. On Wednesday, July 17, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.³³ The lower third banner of the screen said “RUDY GIULIANI | AMERICA’S MAYOR LIVE FROM RNC 2024.” This episode is available at <https://x.com/RudyGiuliani/status/1813713279107420399> and <https://x.com/i/broadcasts/1LyxBgeDlnrKN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 35.

50. On Thursday, July 18, 2024, Mr. Giuliani broadcast The Rudy Giuliani Show.³⁴ On the broadcast, Mr. Giuliani said “Hello, this is Rudy Giuliani and I am coming to you from, you know where, the Republican National Convention.”³⁵ This episode is available at <https://x.com/RudyGiuliani/status/1814072255753977941> and <https://x.com/i/broadcasts/1DXGydgOlWLKM>. A true and correct copy of that video is submitted with this Declaration as Exhibit 36.

51. On Friday, July 19, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.³⁶ On the broadcast, Mr. Giuliani said “Good evening. This is Rudy Giuliani and I am uh bringing you The Rudy Giuliani Show and once again, from uh Milwaukee, Wisconsin.”³⁷ This episode is

³³ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show Live from RNC*, X, (July 17, 2024 7:11 PM) <https://x.com/RudyGiuliani/status/1813713279107420399> (post archived at <https://perma.cc/K7NS-QQ2L>), (video archived at <https://perma.cc/4NX6-GPRM>).

³⁴ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show Live from RNC*, X, (July 18, 2024 6:58 PM) <https://x.com/RudyGiuliani/status/1814072255753977941> (archived at <https://perma.cc/F79H-8Z8E>).

³⁵ *Id.* at 2:57–3:09.

³⁶ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Recapping the 2024 Republican National Convention*, X, (July 19, 2024 7:00 PM) <https://x.com/RudyGiuliani/status/1814435087536345591> (post archived at <https://perma.cc/3RZJ-EUWY>), (video archived at <https://perma.cc/4GB4-4MRP>).

³⁷ *Id.* at 1:16–1:30.

available at <https://x.com/RudyGiuliani/status/1814435087536345591> and <https://x.com/i/broadcasts/1rmGPoaeOrEKN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 37.

52. On Friday, July 19, 2024, Mr. Giuliani broadcast *America's Mayor Live*.³⁸ Mr. Giuliani began the broadcast by saying “Good Evening, This is America’s Mayor Live and Live from Milwaukee, Wisconsin.”³⁹ This episode is available at <https://x.com/RudyGiuliani/status/1814450271197770002> and <https://x.com/i/broadcasts/1LyxBgeAaBOKN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 38.

53. On Monday, July 22, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁴⁰ During the broadcast, Mr. Giuliani said “Good evening. This is Rudy Giuliani and I am back uh with you, back in uh, well, in New Hampshire, in Manchester, New Hampshire today.”⁴¹ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1815522255654498450> and <https://x.com/i/broadcasts/1vAxROZljPaKl>. A true and correct copy of that video is submitted with this Declaration as Exhibit 39.

³⁸ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E455): President Donald Trump's Historic 2024 Republican National Convention*, X, (July 19, 2024 8:00 PM) <https://x.com/RudyGiuliani/status/1814450271197770002> (post archived at <https://perma.cc/33Z5-7D6B>), (video archived at <https://perma.cc/AE4B-TCDB>).

³⁹ *Id.* at 0:00–0:08.

⁴⁰ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Secret Service Director's Testimony Fuels "Conspiracy Theories"*, X, (July 22, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1815522255654498450> (post archived at <https://perma.cc/Y6CK-84G3>), (video archived at <https://perma.cc/5JFP-D3JE>).

⁴¹ *Id.* at 1:17–1:26.

54. On Tuesday, July 23, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁴² For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

55. The July 23, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1815884640290496601> and <https://x.com/i/broadcasts/1dRKZdBkkBMJB>. A true and correct copy of that video is submitted with this Declaration as Exhibit 40.

56. The July 23, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1815900340958744904> and <https://x.com/i/broadcasts/1rmxPoZEPWDJN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 41.

57. On Wednesday, July 24, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁴³ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

58. The July 24, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1816252354028859406> and

⁴² Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Biden Is OUT, Kamala is IN*, X, (July 23, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1815884640290496601> (post archived at <https://perma.cc/CX76-FTHP>), (video archived at <https://perma.cc/34E9-SGYU>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E457): Joe Biden Forced Out as Democrat Party Elites Coronate Kamala Harris*, X, (July 23, 2024 8:02 PM EST) <https://x.com/RudyGiuliani/status/1815900340958744904> (post archived at <https://perma.cc/467S-JXYP>), (video archived at <https://perma.cc/3Z2A-LJQ6>).

⁴³ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Democrat Party "Elites" Coronates Kamala Harris; Disenfranchising Millions of Voters*, X, (July 24, 2024 7:21 PM EST) <https://x.com/RudyGiuliani/status/1816252354028859406> (post archived at <https://perma.cc/AAR9-F9EQ>), (video archived at <https://perma.cc/39X5-5CQ3>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E458): Democrat Party Elites Install Kamala Harris, Disenfranchising Voters*, X, (July 24, 2024 8:04 PM EST) <https://x.com/RudyGiuliani/status/1816263277271543865> (post archived at <https://perma.cc/CAF6-WDVC>), (video archived at <https://perma.cc/P37C-Y85Q>).

<https://x.com/i/broadcasts/1ynKODQNoYrGR>. A true and correct copy of that video is submitted with this Declaration as Exhibit 42.

59. The July 24, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1816263277271543865> and <https://x.com/i/broadcasts/1YpKklXqYWmGj>. A true and correct copy of that video is submitted with this Declaration as Exhibit 43.

60. On Thursday, July 25, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁴⁴ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

61. The July 25, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1816609402088300567> and <https://x.com/i/broadcasts/1BdGYEaRQXlGX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 44.

62. The July 25, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1816624487753986447> and <https://x.com/i/broadcasts/1yoJMyNkoYoJQ>. A true and correct copy of that video is submitted with this Declaration as Exhibit 45.

⁴⁴ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Analyzing FBI Director Christopher Wray's Disastrous Hearing*, X, (July 25, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1816609402088300567> (post archived at <https://perma.cc/Y5JD-QUBQ>), (video archived at <https://perma.cc/M83G-LJRZ>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E459): FBI Director Christopher Wray's Shameful Testimony Before Congress*, X, (July 25, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1816624487753986447> (post archived at <https://perma.cc/NKT2-CSDA>), (video archived at <https://perma.cc/8247-TYZ2>).

63. On Saturday July 27, 2024, Mr. Giuliani appeared to briefly livestream from a conference in Paris, France.⁴⁵ Public reporting later confirmed his attendance at the conference.⁴⁶ This report is available at <https://x.com/RudyGiuliani/status/1817198946722148398>. A true and correct copy of that article is attached as Exhibit 46.

64. On Monday, July 29, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁴⁷ Mr. Giuliani began the broadcast by saying “Good Evening, This is Rudy Giuliani and this is the Rudy Giuliani Show, and this is London England.”⁴⁸ This episode is available at <https://x.com/RudyGiuliani/status/1818058972240429125> and <https://x.com/i/broadcasts/1RDGlyXbRArJL>. A true and correct copy of that video is submitted with this Declaration as Exhibit 47.

65. On Thursday, August 1, 2024, Mr. Giuliani broadcast *America's Mayor Live*.⁴⁹ Mr. Giuliani began the broadcast by saying “Good evening, this is Rudy Giuliani and I am Live from Paris France.”⁵⁰ This episode is available at <https://x.com/RudyGiuliani/status/1819161212552466941> and <https://x.com/i/broadcasts/1YpKklRvXQjGj>. A true and correct copy of that video is submitted with this Declaration as Exhibit 48.

⁴⁵ Rudy W. Giuliani, (@RudyGiuliani) X (July 27, 2024 10:02 AM EST) <https://x.com/RudyGiuliani/status/1817198946722148398>. See also Rudy W. Giuliani, (@RudyGiuliani), X (July 27, 2024, 9:43 AM) <https://x.com/RudyGiuliani/status/1817194066334920716> (“I am about to go live to Iranian dissidents in Paris, Albania and Iran, yes Iran. Listen live on X or later on the live recording.”);

⁴⁶ Conference with Mayor Rudy Giuliani on the Anniversary of the Attack on Ashraf by Khamenei's Puppet Government in Iraq, Maryam Rajavi (Aug. 1, 2024), <https://www.maryam-rajavi.com/en/conference-mayor-rudy-giuliani-ashraf-attack-july-28-29-2009/>.

⁴⁷ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, Olympics Open Attack on Western Civilization, X, (July 29, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1818058972240429125> (post archived at <https://perma.cc/5HPF-8R5Q>), (video archived at <https://perma.cc/YC3C-KEKX>).

⁴⁸ *Id.* at 1:16–1:24.

⁴⁹ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E464): Biden Admin Gives Plea Deal to 9/11 Terrorist Khalid Sheikh Mohammed*, X, (August 1, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1819161212552466941> (post archived at <https://perma.cc/DSA5-WCS7>), (video archived at <https://perma.cc/9C4J-2Y7M>).

⁵⁰ *Id.* at 0:00–0:08.

66. On Friday, August 2, 2024, Mr. Giuliani broadcast *America's Mayor Live*.⁵¹ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1819523718332535010> and <https://x.com/i/broadcasts/1djGXrbPAPexZ>. A true and correct copy of that video is submitted with this Declaration as Exhibit 49.

67. On Monday, August 5, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁵² During the broadcast, Mr. Giuliani confirmed he was “back from my trip to um to France and to England.”⁵³ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1820595684837585364> and <https://x.com/i/broadcasts/1vOGwrwBAedKB>. A true and correct copy of that video is submitted with this Declaration as Exhibit 50.

68. On Tuesday, August 6, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁵⁴ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

⁵¹ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E465): Kamala Harris to Interview SIX Potential VP Picks This Weekend*, X, (August 2, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1819523718332535010> (post archived at <https://perma.cc/Z7B8-T2CE>), (video archived at <https://perma.cc/A4X3-DDYW>).

⁵² Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Decision Time for Kamala Harris*, X, (August 5, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1820595684837585364> (post archived at <https://perma.cc/E3JA-GL9K>), (video archived at <https://perma.cc/W9HL-SB8S>).

⁵³ *Id.* at 1:23–1:30.

⁵⁴ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Kamala Harris Sides w/ Left Flank by Choosing Tim Walz for VP*, X, (August 6, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1820958077681856984> (post archived at <https://perma.cc/YNN5-7MCB>), (video archived at <https://perma.cc/GGR5-6VY2>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E467): Kamala Harris Picks Tim Walz for Vice President*, X, (August 6, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1820973245518291281> (post archived at <https://perma.cc/N9GK-HSYC>), (video archived at <https://perma.cc/8V38-5K58>).

69. The August 6, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1820958077681856984> and <https://x.com/i/broadcasts/1LyxBgpjPnpKN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 51.

70. The August 6, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1820973245518291281> and <https://x.com/i/broadcasts/1OdJrXagmlqKX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 52.

71. On Wednesday, August 7, 2024, Mr. Giuliani broadcast *America's Mayor Live*.⁵⁵ Mr. Giuliani began the broadcast by saying “This is Rudy Giuliani and this is America’s Mayor Live from uh the great state of New Hampshire.”⁵⁶ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1821335593533763840> and <https://x.com/i/broadcasts/1RDGlyjWQAlJL>. A true and correct copy of that video is submitted with this Declaration as Exhibit 53.

72. On Thursday, August 8, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁵⁷ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

⁵⁵ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live* (E468): Cori Bush of "The Squad" Loses Primary Election—2 Voted Out, 7 To Go, X, (August 7, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1821335593533763840> (post archived at <https://perma.cc/93LS-9W82>), (video archived at <https://perma.cc/L33D-HBLQ>).

⁵⁶ *Id.* at 0:00–0:11.

⁵⁷ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Trump Hosts Press Conference That Runs Longer Than All of Harris's Combined*, X, (August 8, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1821682848304394642> (post archived at <https://perma.cc/5MKE-GDZF>), (video archived at <https://perma.cc/4TYY-VPSJ>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live* (E469): *Trump Takes Reporter's Questions as Harris Continues to Dodge the Press*, X, (August 8, 2024

73. The August 8, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1821682848304394642> and <https://x.com/i/broadcasts/1DXxydBRmkRJM>. A true and correct copy of that video is submitted with this Declaration as Exhibit 54.

74. The August 8, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1821697996599521470> and <https://x.com/i/broadcasts/1MYxNMRmeBNJw>. A true and correct copy of that video is submitted with this Declaration as Exhibit 55.

75. On Friday, August 9, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁵⁸ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

76. The August 9, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1822045236677505208> and <https://x.com/i/broadcasts/1MnGnDVwLmNxQ>. A true and correct copy of that video is submitted with this Declaration as Exhibit 56.

77. The August 9, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1822060369768280184> and <https://x.com/i/broadcasts/1MnxnDVwwweGO>. A true and correct copy of that video is submitted with this Declaration as Exhibit 57.

8:00 PM EST) <https://x.com/RudyGiuliani/status/1821697996599521470> (post archived at <https://perma.cc/36CU-J7SA>), (video archived at <https://perma.cc/4VCC-NEJK>).

⁵⁸ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Return of ISIS*, X, (August 9, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1822045236677505208> (post archived at <https://perma.cc/M4QX-6RQZ>), (video archived at <https://perma.cc/7VBX-8TG6>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E470): Weakness in West Reinvigorates the Islamic State of Iraq & Syria (ISIS)*, X, (August 9, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1822060369768280184> (post archived at <https://perma.cc/QW2Z-ZH78>), (video archived at <https://perma.cc/Q87D-8NZ4>).

78. On Monday, August 12, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁵⁹

Mr. Giuliani began the broadcast by saying “Good evening, it’s Rudy Giuliani and sitting behind me is not the World’s Fair. No, no, it’s not, it’s not the closing down of the pornographic Olympics, it’s not, it’s not Las Vegas. You know, that building over this shoulder, over this shoulder—I gotta make sure I’ve got the right one—over this shoulder there, right there, right there. That is not a casino, that’s Dallas Texas.”⁶⁰ This episode is available at <https://x.com/RudyGiuliani/status/1823132360692682848> and <https://x.com/i/broadcasts/1mrxmlMdAnkzxy>. A true and correct copy of that video is submitted with this Declaration as Exhibit 58.

79. On Tuesday, August 13, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁶¹

During the broadcast, Mr. Giuliani said “this is Rudy Giuliani and this is the Rudy Giuliani Show. Right behind me is the festive city of Dallas Texas.”⁶² This episode is available at <https://x.com/RudyGiuliani/status/1823494772872634874> and <https://x.com/i/broadcasts/1dRKZdoeBrmJB>. A true and correct copy of that video is submitted with this Declaration as Exhibit 59.

80. On Wednesday, August 14, 2024, Mr. Giuliani broadcast *America’s Mayor Live*.⁶³

Mr. Giuliani began the broadcast by saying “Rudy Giuliani coming to you with America’s Mayor

⁵⁹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *President Trump to Sue Justice Department Over Mar-a-Lago Raid*, X, (August 12, 2024 7:00 PM) <https://x.com/RudyGiuliani/status/1823132360692682848> (post archived at <https://perma.cc/3U8S-A6WF>), (video archived at <https://perma.cc/73Q2-W6QR>).

⁶⁰ *Id.* at 1:10–1:41.

⁶¹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Press Continues to Capitulate to Kamala Harris and Her Campaign*, X (August 13, 2023 7:00 PM EST) <https://x.com/RudyGiuliani/status/1823494772872634874> (post archived at <https://perma.cc/6NLX-JLTC>).

⁶² *Id.* at 2:15–2:30.

⁶³ Rudy W. Giuliani, (@RudyGiuliani) America’s Mayor Live, *America’s Mayor Live (E473): President Trump Delivers Home Run Economic Speech as Kamala Dodges Qs*, X, (August 14, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1823872328964694471> (post archived at <https://perma.cc/TE8D-ZWMJ>), (video archived at <https://perma.cc/8W6H-TTJZ>).

Live. Live by the skin of our teeth, from Manchester, New Hampshire.”⁶⁴ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1823872328964694471> and <https://x.com/i/broadcasts/1RDxlyBQZglKL>. A true and correct copy of that video is submitted with this Declaration as Exhibit 60.

81. On Thursday, August 15, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁶⁵ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

82. The August 15, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1824219563267064207> and <https://x.com/i/broadcasts/1MnGnDAMZlOxO>. A true and correct copy of that video is submitted with this Declaration as Exhibit 61.

83. The August 15, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1824234802490511501> and <https://x.com/i/broadcasts/1OdKrXkjBBQJX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 62.

84. On Friday, August 16, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁶⁶ Mr. Giuliani began the broadcast by saying “Good evening, this is the Rudy Giuliani Show, and

⁶⁴ *Id.* at 0:00–0:17.

⁶⁵ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *JD Vance & Tim Walz Agree to Oct. 1 Debate on CBS*, X, (August 15, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1824219563267064207> (post archived at <https://perma.cc/8DHJ-67DP>), (video archived at <https://perma.cc/YLU8-HBZB>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E474): Kamala's Campaign Doctored Headlines on Google to Create Fake Support*, X, (August 15, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1824234802490511501> (post archived at <https://perma.cc/8F4F-DGF4>), (video archived at <https://perma.cc/93Z4-LXTU>).

⁶⁶ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Harris Reverses Clinton Promise to, “End Welfare as we Know it”*, X, (August 16, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1824582094997295408> (post archived at <https://perma.cc/8VLS-P53L>), (video archived at <https://perma.cc/8A8V-WMLM>).

uh we are bringing it to you from New Hampshire.”⁶⁷ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1824582094997295408> and <https://x.com/i/broadcasts/1ynKODnLMrzGR>. A true and correct copy of that video is submitted with this Declaration as Exhibit 63.

85. On Monday, August 19, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁶⁸ The title of the episode identifies Mr. Giuliani’s location at the Democratic National Convention, which took place in Chicago, Illinois. This episode is available at <https://x.com/RudyGiuliani/status/1825671988372975853> and <https://x.com/i/broadcasts/1yNxagyqpMDGj>. A true and correct copy of that video is submitted with this Declaration as Exhibit 64.

86. On Tuesday, August 20, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁶⁹ The title of the episode identifies Mr. Giuliani’s location at the Democratic National Convention, which took place in Chicago, Illinois. This episode is available at <https://x.com/RudyGiuliani/status/1826032015873028215> and <https://x.com/i/broadcasts/1YpJklPVgnyxj>. A true and correct copy of that video is submitted with this Declaration as Exhibit 65.

⁶⁷ *Id.* at 1:10–1:18.

⁶⁸ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show on America's Mayor Live at the DNC*, X, (August 19, 2024 7:11 PM EST) <https://x.com/RudyGiuliani/status/1825671988372975853> (post archived at <https://perma.cc/UMX7-XZ82>), (video archived at <https://perma.cc/WA3K-2DHN>).

⁶⁹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show on America's Mayor Live (E477) at the DNC—Day 2*, X, (August 20, 2024 7:02 PM EST) <https://x.com/RudyGiuliani/status/1826032015873028215> (post archived at <https://perma.cc/3FME-TNP8>), (video archived at <https://perma.cc/8DLQ-262M>).

87. On Wednesday, August 21, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁷⁰ The title of the episode identifies Mr. Giuliani's location at the Democratic National Convention, which took place in Chicago, Illinois. This episode is available at <https://x.com/RudyGiuliani/status/1826344553663844827> and <https://x.com/i/broadcasts/1ynJODnBdkqxR>. A true and correct copy of that video is submitted with this Declaration as Exhibit 66.

88. On Thursday, August 22, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show*.⁷¹ The title of the episode identifies Mr. Giuliani's location at the Democratic National Convention, which took place in Chicago, Illinois. This episode is available at <https://x.com/RudyGiuliani/status/1826745076875493697> and <https://x.com/i/broadcasts/1YqKDkmNYLOxV>. A true and correct copy of that video is submitted with this Declaration as Exhibit 67.

89. On Friday, August 23, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁷² The same day, he posted on X/Twitter, saying "Join us as we wrap up our week from the Windy City and the 2024 Democrat National Convention."⁷³ This post is available at <https://x.com/RudyGiuliani/status/1827145957399548367> and

⁷⁰ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show on America's Mayor Live* (E478) at the DNC—Day 3, X, (August 21, 2024 3:44 PM EST) <https://x.com/RudyGiuliani/status/1826344553663844827> (post archived at <https://perma.cc/JV4P-QYDE>), (video archived at <https://perma.cc/9ZSW-NBMT>).

⁷¹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show on America's Mayor Live* (E479) at the DNC—Day 4, X, (August 22, 2024 6:15 PM EST) <https://x.com/RudyGiuliani/status/1826745076875493697> (post archived at <https://perma.cc/77S6-62X8>), (video archived at <https://perma.cc/56KE-GH9H>).

⁷² Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *The Rudy Giuliani Show Live (E480) Recapping the DNC*, X, (August 23, 2024 7:25 PM EST) <https://x.com/RudyGiuliani/status/1827125130910408798> (post archived at <https://perma.cc/7AWN-R3BG>), (video archived at <https://perma.cc/VLX6-AQAB>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E480): RFK Jr. Endorses President Trump*, X, (August 23, 2024 8:01 PM EST) <https://x.com/RudyGiuliani/status/1827134085187432954> (post archived at <https://perma.cc/6WND-5W5F>), (video archived at <https://perma.cc/SU88-QRYN>).

⁷³ Rudy W. Giuliani, (@RudyGiuliani), X, (August 23, 2024 8:48 PM EST) <https://x.com/RudyGiuliani/status/1827145957399548367> (post archived at <https://perma.cc/2UVZ-6YSF>).

<https://x.com/i/broadcasts/1OdKrXnaDrOJX>. A true and correct copy of that post is attached as Exhibit 68.

90. The backgrounds of Mr. Giuliani's livestreams suggest that Mr. Giuliani is in a building a city center, likely Chicago given his post about the Windy City. The background appears to be a view from approximately the location of Trump Tower, located at 401 N Wabash Ave, Chicago, IL 60611, according to Google Earth.⁷⁴

91. The August 23, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1827125130910408798> and <https://x.com/i/broadcasts/1yNxagEzWXRGj>. A true and correct copy of that video is submitted with this Declaration as Exhibit 69.

92. The August 23, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1827134085187432954> and <https://x.com/i/broadcasts/1OdKrXnaDrOJX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 70.

93. On Monday August 26, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁷⁵ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for portions of the broadcast.

⁷⁴Google Earth, <https://earth.google.com/web/search/Trump+Tower,+North+Wabash+Avenue,+Chicago,+IL/@41.89112016,-87.62889716,211.74038269a,272.10573499d,35y,-42.00145036h,77.24988903t,0r/data=CiwiJgokCW1bUYISgUVAEbgiyAm5gEVAGUIY-zIy3VHAIejJ9ndt3VHAQgIIAToDCgEwSg0I> ARAA (last visited October 1, 2024).

⁷⁵ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *President Trump Honors Fallen Heroes of the 2021 Kabul, Afghanistan Airport Attack*, X, (August 26, 2024 7:01 PM EST) <https://x.com/RudyGiuliani/status/1828206074543120509> (post archived at <https://perma.cc/3VCD-Q47B>), (video archived at <https://perma.cc/H6DJ-VKRR>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E481): President Trump Honors Fallen Heroes of the 2021 Afghanistan Withdrawal*, X, (August 26, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1828221047440843147> (post archived at <https://perma.cc/4CYJ-RMKK>), (video archived at <https://perma.cc/D9LL-RNV9>).

94. The August 26, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1828206074543120509> and <https://x.com/i/broadcasts/1mrxmlDRYnMxy>. A true and correct copy of that video is submitted with this Declaration as Exhibit 71.

95. The August 26, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1828221047440843147> and <https://x.com/i/broadcasts/1rmGPowmgyXKN>. A true and correct copy of that video is submitted with this Declaration as Exhibit 72.

96. On Tuesday, August 27, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁷⁶ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

97. The August 27, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1828568380703666178> and <https://x.com/i/broadcasts/1OdKrXnqjMqJX>. A true and correct copy of that video is submitted with this Declaration as Exhibit 73.

98. The August 27, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1828583380965019996> and <https://x.com/i/broadcasts/1gqGvNPaerlGB>. A true and correct copy of that video is submitted with this Declaration as Exhibit 74.

⁷⁶ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Mark Zuckerberg Admits to Role in Rigging the 2020 Presidential Election*, X, (August 27, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1828568380703666178> (post archived at <https://perma.cc/S4MB-4THV>), (video archived at <https://perma.cc/WH7H-TCJP>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E482): Mark Zuckerberg Admits Facebook's Role in Rigging the 2020 Election*, X, (August 27, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1828583380965019996> (post archived at <https://perma.cc/Y4YM-TW22>), (video archived at <https://perma.cc/9HWS-9XNM>).

99. On Wednesday, August 28, 2024, Mr. Giuliani broadcast *America's Mayor Live*.⁷⁷

Mr. Giuliani began the broadcast by saying “Good evening, this is America’s Mayor Live from uh ‘Live Free or Die’ New Hampshire.”⁷⁸ Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast. This episode is available at <https://x.com/RudyGiuliani/status/1828945772966228273> and <https://x.com/i/broadcasts/1MnxnDbDaVVGO>. A true and correct copy of that video is submitted with this Declaration as Exhibit 75.

100. On Thursday, August 29, 2024, Mr. Giuliani broadcast *The Rudy Giuliani Show* and *America's Mayor Live*.⁷⁹ For both programs, Mr. Giuliani appears to be in front of a wall mounted television, which displayed an American flag for segments of the broadcast.

101. The August 29, 2024 episode of *The Rudy Giuliani Show* is available at <https://x.com/RudyGiuliani/status/1829293038637859073> and <https://x.com/i/broadcasts/1MnxnDOBNXwGQ>. A true and correct copy of that video is submitted with this Declaration as Exhibit 76.

102. The August 29, 2024 episode of *America's Mayor Live* is available at <https://x.com/RudyGiuliani/status/1829308110735028531> and

⁷⁷ Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E483): Analyzing Kamala Harris' Flip Flop on Virtually Every Major Issue*, X, (August 28, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1828945772966228273> (post archived at <https://perma.cc/9VXC-G9VR>), (video archived at <https://perma.cc/KW5Z-P4JS>).

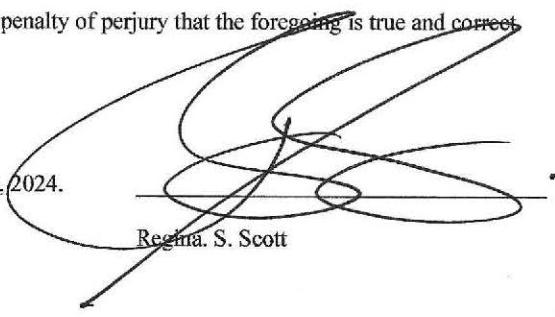
⁷⁸ *Id.* at 0:00–0:11.

⁷⁹ Rudy W. Giuliani, (@RudyGiuliani) The Rudy Giuliani Show, *Contrasting Trump's Townhall Tonight w/ Kamala's Pre-Taped, "Joint" Interview on CNN*, X (August 29, 2024 7:00 PM EST) <https://x.com/RudyGiuliani/status/1829293038637859073> (post archived at <https://perma.cc/GF3N-DKLK>), (video archived at <https://perma.cc/8ZTG-R983>); Rudy W. Giuliani, (@RudyGiuliani) America's Mayor Live, *America's Mayor Live (E484): Comparing & Contrasting Styles—Trump Townhall v. Harris Joint Interview*, X (August 29, 2024 8:00 PM EST) <https://x.com/RudyGiuliani/status/1829308110735028531> (post archived at <https://perma.cc/FFK9-CZPH>), (video archived at <https://perma.cc/3G3F-6UNC>).

<https://x.com/i/broadcasts/1YqxovnYALjJv>. A true and correct copy of that video is submitted with this Declaration as Exhibit 77.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2024.


Regina S. Scott